



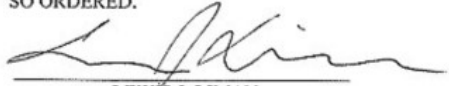
November 16, 2021

BY ECF

The request to adjourn all deadlines in this case is GRANTED. All pending deadlines are adjourned *sine die*.

Hon. Lewis J. Liman
United States District Court
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Room 15C
New York, New York 10007

SO ORDERED.



LEWIS J. LIMAN
United States District Judge

11/16/2021

Re: Joanne Higgins v. 120 Riverside Boulevard at Trump Place
Condominium et al. Civil Action No. 21-cv-04203-LJL
REQUEST FOR BRIEF STAY OF ALL DEADLINES DUE TO
EMERGENCY

Dear Judge Liman:

This firm represents plaintiff Joanne Noel Higgins (“Plaintiff”) in the above-captioned case. Plaintiff respectfully requests a 30 day stay of all deadlines in this matter pursuant to Rule 1(C) of this Courts Individual Practice Rules. Plaintiff’s mother has suffered a massive heart attack and is currently in the Intensive Care Unit after having open heart surgery to stabilize her condition. Plaintiff has asked for time to be with her family during this extremely difficult time. In light of these emergent circumstances and based on the scheduling mandates of my office during the holiday season, we respectfully request a brief adjournment of 30 days for all upcoming deadlines.

This is Plaintiff’s first request for a stay of these upcoming deadlines. Plaintiff has consulted with counsel for and counsel for Carlos A. Galliani and Nancy Galliani (“Seller Defendants”) and counsel for 120 Riverside Boulevard at Trump Place Condominium, the Board of Managers of 120 Riverside Boulevard at Trump Place Condominium, Michael Ritchken, AKAM Associates, Inc., and Ronald Starcie (“Building Defendants”) and all parties have consented to this brief stay. The next scheduled hearing on this matter is the status conference which is currently scheduled for May 3, 2022 at 10:00 a.m, one of the dates which we request be adjourned.

Since this request will impact all deadlines, previously set by the Court, attached hereto as Exhibit A is a proposed modified Case Management and Scheduling Order reflecting a proposed adjustment of the dates. For reference, attached hereto as Exhibit B is the prior Case Management and Scheduling Order dated October 4, 2021. Most urgently, the stay request impacts the following discovery and motion deadlines:

- (i) Plaintiff's responses to Building Defendants' interrogatories due November 15, 2021, extended to December 15, 2021;
- (ii) Plaintiff's responses to Seller Defendants' interrogatories, and responses to both Seller Defendants and Building Defendants document demands due November 17, 2021, extended to December 17, 2021;
- (iii) all Defendants' response to Plaintiff's interrogatories and document demands due November 17, 2021, extended to December 17, 2021;
- (iv) Plaintiff's deadline to file opposition to the Seller Defendants' motion to dismiss due November 19, 2021, extended to December 19, 2021;
- (v) deadline for Seller Defendants to file any reply to Plaintiff's opposition due December 3, 2021, extended to January 14, 2022, as requested by Seller Defendants and consented to by Plaintiff; and
- (vi) all relevant deadlines in the Case Management and Scheduling Order be extended 30 days (see enclosed Exhibit A).

Respectfully Submitted,

/s/ Yenisey Rodriguez-McCloskey

Yenisey Rodriguez-McCloskey

cc: All Counsel By ECF

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